

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

JAN 10 2013

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

IN THE MATTER OF THE SEARCH OF)

The Residence located at 1210 N. 50th St.
East St. Louis, Illinois, including the
detached garage. The residence is a single
story structure, having white siding, with a
detached garage.

CASE NUMBER

13-mj-3002-DGW

FILED UNDER SEAL

APPLICATION AND AFFIDAVIT
FOR SEARCH WARRANT

I, Joseph R. Murphy, being duly sworn depose and say:

I am a Special Agent with the Federal Bureau of Investigation and have reason to believe
that on the person or on the premises known as:

The Residence located at 1210 N. 50th St. East St. Louis, Illinois, including the detached garage.
The residence is a single story structure, having white siding, with a detached garage.
in the Southern District of Illinois there is now concealed a certain person or property, namely:

(See Attachment "A")

which constitutes evidence of the commission of a criminal offense or which is contraband, the
fruits of crime, or things otherwise criminally possessed, or which is designed or intended for use
which is or has been used as the means of committing an offense in violation of Title 18 United
States Code, Section 513 (uttering and possessing a forged security [check] of a political
subdivision of a State) within the scope of Rule 41(c) of the Federal Rules of Criminal Procedure
as property subject to search and seizure.

The facts to support the issuance of a Search Warrant are as follows:

I. INTRODUCTION

1) Affiant is a Special Agent with the Federal Bureau of Investigation and has been for the past fourteen years. During this time, Affiant has conducted and assisted with numerous criminal investigations involving federal fraud. Affiant for the Federal Bureau of Investigation with the assistance of the Internal Revenue Service / Criminal Investigations, in conjunction with the Metro-East Public Corruption Task Force, has been involved in an investigation of Douglas T. Knowles for violations of federal law. During the course of the investigation, several sources of information have been utilized, including but not limited to public records, business records, review of surveillance videos, and other agency records. All the information contained in this affidavit is based on the personal knowledge of your affiant and the investigative sources of your affiant and the other members involved in this investigation.

2) Based on the information contained in this affidavit, Affiant believes that the forgery of a government check has been committed, in violation of Title 18, United States Code, Section 513 has been committed by Douglas T. Knowles and that there is probable cause to believe that evidence of the commission of that criminal offense will be found at the residence of Douglas Knowles, 1210 N. 50th St. East St. Louis, Illinois.

II. Title 18, United States Code, Section 513 – Securities of the States and private entities

3) Title 18, United States Code, Section 513 provides in relevant part that it is a federal crime to make, utter or possess a forged security of a State or a political subdivision of a State with the intent to deceive another person, organization, or government. Under the statute, “forged” means a document that purports to be genuine but is not because it has been falsely

altered, completed, signed, or endorsed, or contains a false addition thereto, or insertion therein, or is a combination of parts or two or more genuine documents. Under the statute, "security" is defined to include a check.

4) At all times relevant, the Village of Washington Park, Illinois was a political subdivision of the State of Illinois, located in St. Clair County, within the Southern District of Illinois. According the Village's website, Washington Park was first incorporated on December 15, 1923. It is an impoverished local government having unsuccessfully sought federal bankruptcy protection in 2010.

5) On Monday, January 7, 2013, it was brought to the attention of federal law enforcement that Douglas Knowles, the Public Works/Street Superintendent for the Village of Washington Park had improperly obtained a Village check from the Village Administrator of the Village of Washington Park and had forged the endorsement of the Mayor on the check which he then used to purchase a stove for his private residence.

6) Further investigation and records revealed that on December 26, 2012, Douglas T. Knowles purchased and picked up a gas range from Gil Klein TV & Appliance, Inc., a/k/a Klein's Brand Source, 10338 Lincoln Trail, Fairview Heights, Illinois. The gas range was purchased by Knowles in the name of the Village of Washington Park and he presented for payment a Village of Washington Park check purported to be signed by the Mayor, James Jones.

7) On or about January 3, 2013, the check was returned by a financial institution as an account closed check.

8) On or about January 3, 2013, the store notified the Village of Washington Park of the account closed check.

9) On January 4, 2013, Douglas T. Knowles was interviewed by individuals with the Village of Washington Park Police Department. Douglas T. Knowles signed an acknowledgement that he had been provided his Miranda rights. Douglas T. Knowles then made a consensual videotaped statement. During that statement he acknowledged obtaining a blank check from the Village Hall and using that check without authority to obtain and pay for a gas range. Knowles indicated that he signed the name of the Mayor, James Jones to the check. Knowles indicated that he picked up the gas range in a Village vehicle and took the range to his residence. Knowles indicated that he has received checks from the Village in this manner in the past.

10) Douglas T. Knowles is a previously convicted felon, having been convicted of forgeries in St. Clair County, Illinois in July of 2007.

11) Douglas T. Knowles resides at 1210 N. 50th St. East St. Louis, Illinois.

12) Based upon your affiant's knowledge, training, and experience, including consultations with other agents who are experienced in theft related investigations, I have reason to believe:

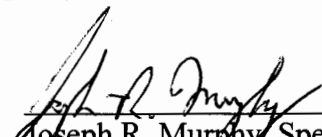
- a. That people who commit property theft crimes often have in their residence records and documents associated with the offenses and the activities carried out by the person committing the offenses.
- b. Proceeds of such thefts are often kept at residences to be utilized by the subjects or sold / given away at a later date.

13) The above facts provide probable cause to believe that in the Southern District of Illinois, within the premises identified as

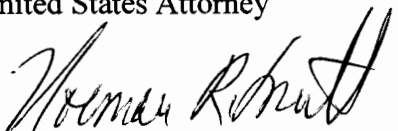
1210 N. 50th St. East St. Louis, Illinois

there is located the items set forth in Attachment "A" which is evidence of the commission of an offense in violation of Title 18 United States Code, Section 513 (uttering and possessing a forged security [check] of a political subdivision of a State) within the scope of Rule 41(c) of the Federal Rules of Criminal Procedure as property subject to search and seizure.

FURTHER AFFIANT SAYETH NAUGHT.

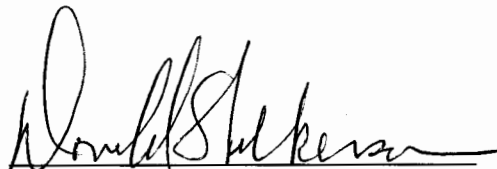

Joseph R. Murphy, Special Agent
Federal Bureau of Investigation

Stephen Wiggington
United States Attorney


NORMAN R. SMITH
Assistant United States Attorney

State of Illinois)
) SS.
County of St. Clair)

Sworn to before me, and subscribed in my presence on the 10th day of January
2013 at East St. Louis, Illinois.


HON. DONALD G. WILKERSON
United States Magistrate Judge

Attachment A
Items to be Seized

- 1) A gas range, SERIAL # vf24231075 [to be photographed, not seized]
- 2) Any paperwork associated with the purchase of the gas range to include, receipts, manuals, written warranty material.
- 3) Originals or copies of any check for an account of the Village of Washington Park.
- 4) All records of cash receipts, bank deposits,
- 5) PROOF OF RESIDENCY: Indicia of ownership of the premises described above, to include: utility and telephone bills, trash removal statements and bills, cancelled envelopes, real estate tax statements, construction or improvement bills, materials purchase receipts, insurance documents, safety deposit box keys, and personal documents or photographs.

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Attachment B
Photos of Douglas T. Knowles Residence

